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## TELECOPIER COVER SHEET

TELECOPIER NUMBER:

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OFFICE OF THE  
EXECUTIVE SECRETARY  
292-1361

TO: Mr. David Waddell

TELECOPIER NUMBER: 615-741-5015

DATE: 6-22-01

FROM: Janice Perry / Charles Perry

RE: Henry Gower - On-Site Systems

## PLEASE NOTE:

These are the facts that were presented  
at our cities last meeting on June  
5, 2001. Please overlook first paragraph  
to City Officials.

Thank you,

Janice Perry

Perry's

2644 Henry Gower Rd

Pleasant View, TN

37146

TOTAL NUMBER OF PAGES (INCLUDING COVER SHEET): 6

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Henry Gower Rd  
On Site System

## Environment

It is the duty of a city's elected and appointed officials to protect the community they serve. Public service is often a thankless job involving difficult decisions that affect everyone in the community sooner or later. We, as members of the community you serve can appreciate your sacrifice and would like to take this opportunity to thank you for your hard work. Our confidence in your abilities as a governing body brings us together to present our arguments against the proposed sewer system, which are based upon the facts.

According to my sources, sewer systems can be expected to leak about 20 percent of the time. Why should we bring the troubles of waste disposal that have become common in larger cities at a time when the actual needs of our community and its citizens don't warrant such an action? As my neighbors are eager to point out, the proposed system will be designed and implemented for the benefit of only a few residents with the potential to affect us all in the way of additional lagoons bringing health risks, nuisance odors (which are caused by real and dangerous toxins), and financial consequences with them. We understand that the driving force behind this effort has been labeled as "growth," but are the risks to the citizens of Coopertown worth the reward and who stands to benefit?

According to the TVA, which actively promotes the decentralized treatment facilities, the systems are "usually located on or near the property they serve." The proposed site on Henry Gower is, in my opinion, a considerable distance from the property it is expected to serve just off of York Road. The TVA's information sites over and over the importance of a "responsible", and "highly competent" management and engineering teams to ensure the proper function of this system over the long-term and ultimately the safety of the area served by the system. In fact, the TVA sites "lack of competent management" as one of the biggest barriers to the use of this system. If this system is approved, it is in our own best interest as a community to do the necessary due diligence into On-Site systems' past, present, and future capacities to build and operate this type of facility. How many have they built, how many do they operate, how many of these facilities that they built and operate have we visited? In order to be fully aware, we need to compare apples to apples. Just as with any major investment, it is up to the investor to research their purchase to the greatest extent of their capabilities. *Res Ipsa Loquitur* is a legal term for "let the buyer beware."

Our research has found no geological or environmental studies filed in connection with On-Site's proposal. Time constraints have been a major factor in our own research, though we believe that the information we seek is available. We ask that the Zoning Appeals board defer judgement on this matter until a time that they can come to a complete and informed decision regarding the safety, viability, and feasibility of the proposed project as a whole.

Safety of the decentralized wastewater treatment system should be the primary concern of both residents and city officials. The EPA suggested in their 1997 report to Congress on this new type of system that homeowners be given educational materials to explain proper operation and maintenance practices and the consequences of system failures. Apparently, some of the same problems which cause traditional septic systems to fail present problems for this system as well, only on a much larger scale. Rather than one homeowner's septic tank failing and making a mess on his own property, imagine the mess when 200 homeowners lines, all flowing into the same tank, result in a failure all because one or two homeowners forgot to "follow the directions" that came with their house.

Again, taken from the TVA's information: for a sophisticated system where relatively high quality wastewater must be disposed of in an area with soil that is unsuitable for conventional drainfields, the cost may run as high as \$15,000 or more per homeowner. And with competent management, the typical monthly fees [for homeowners] would be in the range of \$20 to \$30 a month for each homeowner. Keep in mind that these costs will be passed along to future residents of Coopertown who connect to this system. Will this cost be an incentive or a deterrent to homebuyers in Coopertown?

Surely, for the reasons given, if not for the battery of specific environmental issues which time has not permitted me to cover, the zoning appeals board will defer the approval of this system until these issues can

be adequately addressed. Additionally, I will be happy to provide my sources on any of the quotes given in my statement.

#### 5. Decentralized Wastewater treatment

A. according to the TVA, "it's usually located on or near the property it serves.

B. TVA is taking an active role in promoting the use of decentralized wastewater treatment technology.

C. Plants being grown are not intended for animal consumption. There is a reason for this.

D. The system is designed to handle 22,500 gallons per day.

E. Over and over, the TVA site mentions "This type of treatment system requires a responsible management team to operate and maintain it over the long term."

F. For a sophisticated system where relatively high quality wastewater must be disposed of in an area with soil that is unsuitable for conventional drainfields, the cost may run as high as \$15,000 or more per homeowner.

G. With competent management, the typical monthly fees would be in the range of \$20 to \$30 a month for each homeowner. To minimize costs it is very important to use competent engineers and management and to develop a cooperative relationship with regulatory agencies and other interested parties.

#### H. Maintenance:

1. Most systems will require a highly competent professional to routinely check for proper operation and perform preventative maintenance and repairs as needed.

2. Inspection of systems serving subdivisions or larger areas range in frequency from weekly to monthly. Replacement mechanical and electrical components must be readily available.

I. "Lack of competent management" cited by the EPA as a barrier to the use of this system

J. EPA believes that "developing educational materials for homeowners to explain proper operation and maintenance practices and the consequences of system failures.

K. Some of the same problems which cause septic systems can cause this system to fail as well, only on a larger scale.

#### 6. Contamination:

As modern societies grow and change, they must deal with increasingly severe problems associated with this growth. One such problem facing municipalities across the United States, is how to handle increasing quantities of sewage sludge and septage. Decisions made by governments are one of the most important factors in determining how society addresses these critical choices. Residents and especially close neighbors often have serious concerns about sewage sludge...in their area. Local governments are the most accessible arenas in which concerned parties can seek assistance to address their concerns.

a. "Part 503 defines sewage sludge as a solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works. Part 503 refers to the major federal regulations pertaining to sewage sludge and septage.

A. Sewage Sludge contains ammonia and dimethyl disulfide, which has been proven to cause "severe irritation of the eyes, skin, and mucous membranes followed by respiratory and gastrointestinal illness." From my research I have found at least two cases that resulted in death. Dimethyl Disulfide gives sludge its characteristic "rotten cabbage" odor. Ammonia begins to be emitted at high rates as soon as sludge is limed at the waste treatment facility prior to hauling. However, its odor is masked by the strong odor of Dimethyl Disulfide when Dimethyl Disulfide periodically reaches high concentrations in the field.

B. EPA's inspector general released a report on EPA's oversight of land application of sewage sludge, concluding that "while EPA promotes land application, EPA cannot assure the public that current land application practices are protective of human health and the environment."

C. According to Dr. Raymond Singer, a neurotoxicologist serving as a consultant to the US Department of Health and Human Services, due to clay [in the soil in one of his studies], the drainage flowed towards the subject's property. The family's livelihood, a herd of 150 cattle, deteriorated to the point where they were given up and the property was abandoned. He concludes that municipal sludge poses a measurable neurotoxic hazard to nearby residents and farm workers, who need to be informed of possible neurotoxic injury from their exposure, and then monitored using repeated neurobehavioral tests.

#### D. Show Me Farms

1. The company said it will check for and patch leaks in the pond's clay bottom.

2.the fecal coliform bacteria count in the water was 1800 times higher than the acceptable rate.

Nutrients are absorbed by soil particles or taken up by plants. However, these processes only work in soil that has air in it. The soil cannot be saturated with water. When the soil is saturated, biological breakdown will be incomplete and nutrients will move much greater distances, sometimes hundreds of feet from the drainfield or mound, and possibly into surface water.

The subdivision that this particular lagoon would be used for, from my understanding now has a permit for it's own system (Dard). Why is this lagoon-pond needed? It is a great distance from proposed industrial area? Is this plan thought out very well?

This "pond" on Henry Gower is only 1200-1500 ft from several homes. There is a total of 35 sq. miles in Coopertown, why does it need ~~to be need~~ to be in a well developed area? When there are miles of undeveloped land available. Janice Penny